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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Interconnection Between Local Exchange)
Carriers and Commercial Mobile Radio)
Service Providers)

CC Docket No. 95-185

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Reply Comments of
CELLULAR COMMUNICATIONS OF PUERTO RICO, INC.

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Summary

Cellular Communications of Puerto Rico, Inc. ("CCPR") is a nonwireline cellular carrier in the Commonwealth of Puerto Rico. CCPR and other commercial mobile radio service ("CMRS") providers have experienced high interconnection charges and a complete disregard for the Commission's policies of mutual compensation and good faith negotiations on the part of local exchange carriers ("LECs"). Accordingly, the Commission should complete this rulemaking despite the allegations made by the Puerto Rico Telephone Company ("PRTC") and other LECs that regulations are unnecessary or prohibited by the Telecommunications Act of 1996 (the "1996 Act").

CCPR has proposed that, at least in Puerto Rico, where PRTC, the LEC with which CCPR must interconnect, is an affiliate of the State government, bill and keep principles be applied to all facilities used in the termination of calls. Several parties have advocated this same total-system bill and keep arrangement for a variety of sound reasons. Accordingly, the Commission should adopt regulations requiring total-system bill and keep in all CMRS-LEC interconnection situations. Furthermore, the Commission has the authority to establish specific federal requirements for interstate and intrastate LEC-CMRS interconnection arrangements.

who profit from each day that the current regulatory scheme continues, can best be seen as a delaying tactic.² From the standpoint of incumbent monopolist LECs the existing structure of "take it or leave it" contracts and excessive rates is working well.³ However, CCPR and other carriers are experiencing difficulties that amount to confiscatory interconnection charges and a complete disregard for the Commission's policies of mutual compensation and interconnection agreements arising from good faith negotiations.⁴

The Telecommunications Act of 1996 (the "1996 Act") had a significant impact on the Commission's LEC-CMRS interconnection rulemaking.⁵ In no way, however, did it obviate the need for an order in this proceeding or alleviate the urgency with which new rules are required. Sections 251 and 252 of the 1996 Act make it perfectly clear that the Commission's rules must provide for mutual compensation between interconnecting CMRS carriers and LECs,⁶ that "bill and

² For example, NYNEX states that it earns approximately \$131,500 per day from interconnection charges paid by CMRS providers. NYNEX Comments at 19.

³ See Comments of the United States Telephone Association ("USTA") at 4-8; Bell Atlantic Comments at 9; U.S. West, Inc. Comments at 6.

⁴ CCPR Comments at 4-7; Comments of Western Wireless Corporation at 8-11; Comments of Centennial Cellular Corp., pp. 21 *et seq.*

⁵ See CCPR Comments at 19-20.

⁶ 47 U.S.C. §§ 251(b)(5) and (d)(1).

keep" arrangements are permissible,⁷ and that interconnection should be the subject of good faith negotiations between the parties with approval by and filing with the State regulatory agency.⁸ Furthermore, the Commission must exert its authority to preempt the State agency when it does not fulfill its role in resolving disputes arising from such contract negotiations.⁹ Nonetheless, the 1996 Act leaves considerable discretion to the Commission to craft precise rules that will enable the fair implementation of the interconnection system envisioned by the 1996 Act.

The 1996 Act assigned a monumental task to the Commission. In a very short time it must issue numerous orders required by Congress. Accordingly, it would be an unfortunate and uneconomic waste of limited Commission resources to disregard all the time and effort that has been poured into this docket by the Commission staff and interested parties alike. The Commission has provided a Notice of Proposed Rule Making that clearly set forth the major issues and provided ample options for deliberation. Interested parties have used the opportunity to file voluminous comments enriching the record with details of life

⁷ 47 U.S.C. § 252(d)(2)(B)(i).

⁸ 47 U.S.C. §§ 251(c)(1), 252(e), and 252(h).

⁹ 47 U.S.C. § 252(e)(5).

in the interconnection trenches as well as debating the finer points of the law.

Now these issues are ripe for decision.¹⁰

Because the rules that will be adopted must be consistent with the 1996 Act and will address many of the same issues involved in the rulemaking addressing general interconnection requirements that Congress required in the 1996 Act, the latter proceeding should be that much easier a task. To the extent that rules adopted in this proceeding are "technology neutral," they may be moved intact into subsequent rulemakings. However, because CMRS has a history of interconnection problems that cry out for corrective action and because wireless and wired technologies are seldom perfect analogues of each other, a second rulemaking will not constitute a waste of resources, whereas suspension or termination of the instant proceeding certainly would.

¹⁰ See Comments of the General Services Administration at 7.

II. Compensation for Interconnected Traffic between LECs and CMRS
Providers' Networks
A. Compensation Arrangements
General Pricing Principles

In its comments CCPR provided details of its original interconnection agreement with the Puerto Rico Telephone Company ("PRTC"), the LEC with which it must interconnect in Puerto Rico and an entity of the government of the Commonwealth of Puerto Rico. Comments filed by a PCS licensee in the Puerto Rico MTA indicate that PRTC is, at least, nondiscriminatory in its abuse and treats all nonaffiliated CMRS carriers alike by abusing its control over bottleneck facilities with equal disdain for the Commission's policies in all similar situations.¹¹

CCPR has proposed that, at least in Puerto Rico, where there can be no effective State regulation of interconnection agreements because of the affiliation of the LEC with the State government, bill and keep principles be applied to all facilities used in the termination of calls, including tandem switching and transport

¹¹ See "The Puerto Rico Case Study" attached to Comments of Centennial Cellular Corp.

between the tandem and end offices.¹² Otherwise, the LEC would be able to shift costs into the elements not covered under bill and keep and preserve the CMRS subsidy of LEC inefficiencies.¹³ Some LECs have admitted in their comments that interconnection fees charged to CMRS carriers subsidize other LEC operations.¹⁴ If these LECs are recovering more than the actual costs of interconnection with their charges, it is painfully obvious that PRTC's interconnection charges, amounting to six cents (\$0.06) per minute, constitute a massive subsidy of the landline system by wireline subscribers.

Several parties have advocated the same total-system bill and keep policy for other reasons. Total-system bill and keep is administratively simple.¹⁵ LEC and CMRS services and facilities are essentially similar and potentially

¹² CCPR Comments at 15.

¹³ CCPR Comments at 16. *See also* Comments of AT&T Corp., the other existing broadband PCS licensee in the Puerto Rico MTA, at 13 (prices for the elements excluded from bill and keep would be set at many times above actual cost) and Century Cellunet, Inc. Comments at 5 (LECs would shift charges from local switching and call termination to reimbursable categories).

¹⁴ Taylor, "Affidavit Concerning Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers," attachment to NYNEX Comments, at 12. *See also* GTE Comments at 18-19 (indicating that GTE's flat-rate landline service is subsidized in part by fees from CMRS interconnection).

¹⁵ AT&T Comments at 14.

competitive.¹⁶ Partial-system bill and keep is economically inefficient.¹⁷

Accordingly, for these several reasons, the Commission should adopt the total-system bill and keep proposal advocated by CCPR and these other parties.

¹⁶ AT&T Comments at 14.; MCI Telecommunications Corporation Comments at 5; Personal Communications Industry Association ("PCIA") Comments at 8; Sprint Corporation Comments at 11.

¹⁷ CTIA Comments at 44; Cox Enterprises, Inc. Comments at 35; Joint Comments of Sprint and American Personal Communications at 29; Sprint Corporation Comments at 10. *See also* Comcast Corporation Comments at 22-24 (finding that the 1996 Act supports total-system bill and keep).

II. Compensation for Interconnected Traffic between LECs and CMRS
Providers' Networks
B. Implementation of Compensation Arrangements
Jurisdictional Issues

PRTC has argued that the Commission does not have the authority to establish rates for CMRS-LEC interconnection because it claims that such power is reserved expressly for the States.¹⁸ However, the 1996 Act directs the Commission to establish regulations to govern interconnection.¹⁹ In adopting bill and keep the Commission would be adopting regulations requiring a form of mutual compensation specifically approved by Congress in the 1996 Act.²⁰ Furthermore, the provisions of the 1996 Act that PRTC cites to support its position specifically do not preclude bill and keep arrangements.²¹ In any event, where Congress intended to override an ongoing Commission rulemaking

¹⁸ PRTC Comments at 11.

¹⁹ 47 U.S.C. § 251(d)(1).

²⁰ 47 U.S.C. § 252(d)(2)(B)(i).

²¹ *Id.*

proceeding or prohibit the Commission and State commissions from adopting certain rules, it did so very specifically.²²

Other LECs have argued that Section 252(d)(2)(B)(i) permits bill and keep only in the context of negotiated interconnection agreements.²³ Another provision of the 1996 Act, however, Section 252(a)(1), gives parties the ability to reach agreements without regard to the requirements contained in Section 251(b)(5). Thus, the LECs' suggested interpretation would render the provision in Section 252(d)(2)(B)(i) unnecessary. Section 252(d)(2)(B)(i), therefore, recognizes that, to the extent that the Commission determines bill and keep arrangements represent an appropriate form of reciprocal compensation and represent a reasonable approximation of the actual costs of interconnection, the Commission has the authority to require bill and keep.

The 1996 Act requires that State commissions, in approving negotiated interconnection contracts, consult the requirements of Section 251 and the

²² See, e.g., Telecommunications Act of 1996, Pub. L. No. 104-104, §§ 302(b) (terminating the Commission's video dialtone regulations and policies), 704 (precluding the Commission from preempting state and local zoning authority for telecommunications facilities except with regard to RF emissions and directing the Commission to complete its rulemaking in the RF emissions docket within 180 days), and 705 (access to long distance carriers for CMRS subscribers).

²³ Bell Atlantic Comments at 6; GTE Comments at 36; Pacific Bell Comments at 94.

regulations prescribed by the Commission pursuant to Section 251.²⁴ PRTC and other entrenched monopolists prefer that the Commission promulgate only a federal interconnection "policy framework."²⁵ As CCPR and others have shown, PRTC and other LECs have largely ignored Commission "policy" in the past; nothing would indicate that new policy statements would be any more effective. Accordingly, it is important that the Commission establish specific federal requirements for interstate and intrastate LEC-CMRS interconnection arrangements.

PRTC requests that the Commission leave "ample room" for consistent state regulation of LEC-CMRS interconnection.²⁶ In Puerto Rico, where the LEC is an affiliate of the State, "ample room" means that if there is any uncertainty whatsoever about the applicability of a Commission rule to a situation, the LEC will find within that uncertainty a license to do as it pleases without regard to oft-stated federal policies.²⁷

PRTC's comments represent the unique perspective of an entity that is both a monopolist LEC and its own regulator. A revealing and significant contrast is

²⁴ 47 U.S.C. § 252(e)(2)(B).

²⁵ PRTC Comments at 7; *see also* USTA Comments at 15-16.

²⁶ PRTC Comments at 4.

²⁷ *See* CCPR Comments at 4-7.

available in the comments of the General Services Administration ("GSA"), representing the perspective of both a government agency and a consumer. According to GSA, the 1996 Act directs the Commission to promulgate rules that implement carriers' obligations under Section 251 without distinction between interstate or intrastate services.²⁸ GSA further considers it inconsistent with the spirit of the 1996 Act for different rates and policies to apply to interstate and intrastate calls.²⁹ Thus, the Commission should adopt regulations that are necessary to enable fair and efficient LEC-CMRS interconnection without undue attention to parties that have profited in the absence of clear and enforceable rules.

²⁸ GSA Comments at 11.

²⁹ GSA Comments at 16.

Cellular Communications of Puerto Rico, Inc.

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Conclusion

Based upon the record before it, the Commission should adopt specific federal requirements for bill and keep interstate and intrastate LEC-CMRS interconnection arrangements. Such requirements should include all elements of both CMRS and LEC networks necessary to terminate calls originating on the other's facilities.

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